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APR - 6 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: EX PARTE  
CC Docket No. 92-237

Attached are two copies of a joint letter delivered today to the Chairman and Commissioners that address number portability issues raised in the ongoing North American Numbering Plan Administration proceeding. Copies were also distributed to Commission staff listed on the attached service list.

Respectfully submitted,

Laura Phillips

Leonard J. Kennedy  
Laura H. Phillips

100-443600-100  
 100-443600-100

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July 6, 1995

VIA HAND DELIVERY

The Honorable Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M Street Room 814  
Washington, D.C. 20554

Dear Chairman Hundt:

The central role of telephone number portability in the development of telecommunications competition is well understood by Congress, the Commission and the telecommunications industry. The undersigned companies are writing to you to urge the Federal Communications Commission to take a leadership role to ensure that number portability will be achieved rapidly and consistently in the nation's telecommunications markets.

The Commission has recognized that number portability is a key element to open the telephone market to competition. As companies that are investing substantial time, money and effort to bring competition to this market, we ask the Commission's assistance to ensure that number portability will be realized without delay on a nationwide basis. In our view, the Commission has a unique role and responsibility to ensure rapid and efficient portability of telephone numbers in all markets.

A handful of states are exploring number portability through technical trials. These states are to be commended for their forward-looking efforts in portability experimentation. The results of these tests should materially assist the FCC in its deliberations on portability. As it has on other occasions, the FCC can benefit from the knowledge gained in these states in developing a common set of rules or guidelines for portability.

It would be wrong to conclude, however, that every state has the inclination and resources to engage in portability proceedings. Many states will look to the FCC for leadership on this matter.

Some parties have urged the FCC to await the results of state portability trials before proceeding, or even asserted that the FCC should defer to the states completely for the implementation of number portability. We believe that those arguments are misguided and, if they prevail, will have an adverse impact on the development of competition. With different states exploring different timetables and technologies to implement portability, the prospect of rapid and consistent implementation of number portability and competition diminishes significantly. Moreover, many companies operate their networks in disparate

The Honorable Reed E. Hundt  
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areas. The operational difficulties of conforming to a variety of incompatible system technologies for portability imperils the notion of portability itself.

Now is the time for the Commission to move toward establishing a national policy on number portability with an explicit and expeditious timeline for implementation. The Commission has the opportunity to take this action in advance of passage of significant telecommunications legislation under consideration in Congress to ensure the emergence of telephone competition in markets across the country by establishing appropriate ground rules for number portability. The undersigned companies urge the Commission to take this opportunity to combine the best of what the states have to offer with the federal view of the national importance of uniformity to the public interest in competition and reasonably priced services.

We stand ready to assist the Commission in its work on portability.

Respectfully submitted,

AMERICAN PERSONAL COMMUNICATIONS, L.P.  
AT&T CORPORATION  
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COX ENTERPRISES, INC.  
EASTERN TELELOGIC CORPORATION  
HYPERION TELECOMMUNICATIONS, INC.  
MCI TELECOMMUNICATIONS CORPORATION  
MCLEOD TELEMAGEMENT, INC.  
MFS COMMUNICATIONS COMPANY, INC.  
SPRINT CORPORATION  
SPRINT TELECOMMUNICATIONS VENTURE  
TCI COMMUNICATIONS, INC.  
TELEPORT COMMUNICATIONS GROUP, INC.  
TIME WARNER COMMUNICATIONS, INC.  
U.S. NETWORK CORPORATION

cc: The Honorable James H. Quello  
The Honorable Andrew C. Barrett  
The Honorable Rachelle B. Chong  
The Honorable Susan Ness

July 6, 1995

VIA HAND DELIVERY

The Honorable James H. Quello  
Federal Communications Commission  
1919 M Street Room 802  
Washington, D.C. 20554

Dear Commissioner Quello:

The central role of telephone number portability in the development of telecommunications competition is well understood by Congress, the Commission and the telecommunications industry. The undersigned companies are writing to you to urge the Federal Communications Commission to take a leadership role to ensure that number portability will be achieved rapidly and consistently in the nation's telecommunications markets.

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cc: The Honorable Reed E. Hundt  
The Honorable Andrew C. Barrett  
The Honorable Rachelle B. Chong  
The Honorable Susan Ness

July 6, 1995

VIA HAND DELIVERY

The Honorable Andrew C. Barrett  
Federal Communications Commission  
1919 M Street Room 826  
Washington, D.C. 20554

Dear Commissioner Barrett:

The central role of telephone number portability in the development of telecommunications competition is well understood by Congress, the Commission and the telecommunications industry. The undersigned companies are writing to you to urge the Federal Communications Commission to take a leadership role to ensure that number portability will be achieved rapidly and consistently in the nation's telecommunications markets.

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The Honorable James H. Quello  
The Honorable Rachelle B. Chong  
The Honorable Susan Ness

July 6, 1995

VIA HAND DELIVERY

The Honorable Rachelle B. Chong  
Federal Communications Commission  
1919 M Street Room 844  
Washington, D.C. 20554

Dear Commissioner Chong:

The central role of telephone number portability in the development of telecommunications competition is well understood by Congress, the Commission and the telecommunications industry. The undersigned companies are writing to you to urge the Federal Communications Commission to take a leadership role to ensure that number portability will be achieved rapidly and consistently in the nation's telecommunications markets.

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The Honorable Susan Ness

July 6, 1995

VIA HAND DELIVERY

The Honorable Susan Ness  
Federal Communications Commission  
1919 M Street Room 832  
Washington, D.C. 20554

Dear Commissioner Ness:

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U.S. NETWORK CORPORATION

cc: The Honorable Reed E. Hundt  
The Honorable James H. Quello  
The Honorable Andrew C. Barrett  
The Honorable Rachelle B. Chong

CERTIFICATE OF SERVICE

I, Cynthia S. Shaw, hereby certify that today on this 6th day of July, 1995, I caused a copy of the attached Ex Parte Letter, Docket No. 93-297, to be hand delivered to:

Ruth Milkman, Esq.  
Senior Legal Advisor to  
Chairman Reed E. Hundt  
Federal Communications  
Commission  
1919 M Street, N.W., Room 814  
Washington, D.C. 20554

Rudolfo M. Baca, Esq.  
Legal Advisor to  
Commissioner James H. Quello  
Federal Communications  
Commission  
1919 M Street, N.W., Room 802  
Washington, D.C. 20554

Pete Belvin, Esq.  
Senior Legal Advisor to  
Commissioner James H. Quello  
Federal Communications  
Commission  
1919 M Street, N.W., Room 802  
Washington, D.C. 20554

Jane Mago, Esq.  
Senior Legal Advisor  
to Commissioner  
Rachelle B. Chong  
Federal Communications  
Commission  
1919 M Street, N.W., Room 844  
Washington, D.C. 20554

Ms. Jill Luckett  
Special Advisor to  
Commissioner  
Rachelle B. Chong  
Federal Communications  
Commission  
1919 M Street, N.W., Room 844  
Washington, D.C. 20554

James R. Coltharp, Esq.  
Special Advisor to  
Commissioner Andrew C.  
Barrett  
Federal Communications  
Commission  
1919 M Street, N.W., Room 826  
Washington, D.C. 20554

Lisa B. Smith, Esq.  
Senior Legal Advisor to  
Commissioner Andrew C.  
Barrett  
Federal Communications  
Commission  
1919 M Street, N.W., Room 826  
Washington, D.C. 20554

James L. Casserly, Esq.  
Senior Legal Advisor to  
Commissioner Susan Ness  
Federal Communications  
Commission  
1919 M Street, N.W., Room 832  
Washington, D.C. 20554

David R. Siddall, Esq.  
Legal Advisor to  
Commissioner Susan Ness  
Federal Communications  
Commission  
1919 M Street, N.W., Room 832  
Washington, D.C. 20554

Mary P. McManus  
Legal Advisor to  
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Federal Communications  
Commission  
1919 M Street, N.W., Room 832  
Washington, D.C. 20554

Ms. Karen Brinkmann  
Common Carrier Bureau  
Federal Communications  
Commission  
1919 M Street, N.W., Room 514  
Washington, D.C. 20554

Mr. John Nakahata  
Special Advisor to Chairman  
Reed E. Hundt  
Federal Communications  
Commission  
1919 M Street, N.W., Room 814  
Washington, D.C. 20554

Ms. Kathleen Wallman  
Chief  
Common Carrier Bureau  
Federal Communications  
Commission  
1919 M Street, N.W., Room 500  
Washington, D.C. 20554

Mr. Richard A. Metzger  
Deputy Bureau Chief  
Common Carrier Bureau  
Federal Communications  
Commission  
1919 M Street, N.W. Room 500  
Washington, D.C. 20554

Regina Kenney, Esq.  
Chief, Wireless  
Telecommunications  
Bureau  
Federal Communications  
Commission  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554

Mr. Larry Atlas  
Associate Bureau Chief  
Wireless Telecommunications  
Bureau  
Federal Communications  
Commission  
2025 M Street, N.W., Room 5002  
Washington, D.C. 20554


Mr. Peyton L. Wynns  
Chief  
Industry Analysis Division  
Common Carrier Bureau  
Federal Communications  
Commission  
1919 M Street, N.W. Room 534-I  
Washington, D.C. 20554

James D. Schlichting, Esq.  
Chief  
Policy and Program Planning  
Division  
Common Carrier Bureau  
Federal Communications  
Commission  
1919 M Street, N.W. Room 544  
Washington, D.C. 20554

Melissa W. Newman, Esq.  
Counsel to Bureau Chief  
Common Carrier Bureau  
Federal Communications  
Commission  
1919 M Street, N.W. Room 500  
Washington, D.C. 20554

Allen Barna, Esq.  
Common Carrier Bureau  
Federal Communications  
Commission  
1919 M Street, N.W. Room 518  
Washington, D.C. 20554

John Morhibito, Esq.  
Domestic Facilities Division  
Common Carrier Bureau  
Federal Communications  
Commission  
2025 M Street, N.W., Room 6010  
Washington, D.C. 20554

  
Cynthia S. Shaw